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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC. a Colorado
corporation; ORACLE AMERICA,
INC., a Delaware corporation; and
ORACLE INTERNATIONAL
CORPORATION, a California
corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada
corporation; SETH RAVIN, an
individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**[PROPOSED] ORDER GRANTING ORACLE'S
MOTION TO MODIFY PROTECTIVE ORDER**

1 After consideration of the briefs and supporting documents submitted by the parties, the
2 Court orders as follows:

3 1. The Protective Order in this action is modified as follows: Notwithstanding the
4 confidentiality restrictions in the Protective Order that are applicable to discovery produced in
5 this action designated as “Confidential Information” or “Highly Confidential Information -
6 Attorneys’ Eyes Only,” to the extent provided herein, counsel for Plaintiffs and/or for their
7 affiliates, may use discovery produced in this action by third party CedarCrestone, Inc.
8 (“CedarCrestone”), which has been designated by CedarCrestone as “Confidential Information”
9 or “Highly Confidential Information - Attorneys’ Eyes Only” for purposes of investigating,
10 preparing for, and pursuing litigation, including for copyright infringement, against
11 CedarCrestone.

12 2. For purposes of paragraphs 8, 9, 10, 11, 12, and 14 of the May 21, 2010
13 Stipulated Protective Order, with respect to discovery provided by CedarCrestone, the terms “this
14 Action” and “this litigation” shall include litigation between Oracle (and any of its affiliates) and
15 CedarCrestone relating to the discovery produced by CedarCrestone.

16 3. All other confidentiality restrictions in the Protective Order remain intact.

17 4. Any party to this Protective Order may move for further modification of the
18 Protective Order to allow for use of, or greater access to, discovery produced in this action that
19 has been designated “Confidential Information” or “Highly Confidential Information -
20 Attorneys’ Eyes Only,” to prosecute and/or defend the litigation contemplated in paragraph 1
21 above, and this order is without prejudice to such a motion or opposition to such a motion.

22 IT IS SO ORDERED.

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24 Dated: _____, 2012 _____
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